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November 16, 2005

**HAND DELIVERY**

The Honorable William G. Young  
Chief Judge, United States District Court  
District of Massachusetts  
One Courthouse Way  
Boston, MA 02110

Re: Coverall North America, Inc. v. Padilha, No. 05-11867 (MLW)  
Coverall North America, Inc. v. Lisboa, No. 05-11868  
Coverall North America, Inc. v. Canestraro, No. 05-11869  
Coverall North America, Inc. v. Martins, No. 05-11870  
Coverall North America, Inc. v. Pereira, No. 05-11871  
Coverall North America, Inc. v. Furtado, No. 05-11872  
Coverall North America, Inc. v. De Carvalho, No. 05-11873  
Coverall North America, Inc. v. Sodre, No. 05-11874  
Machado et al. v. Coverall North America, Inc., No. 05-11884

Dear Chief Judge Young:

This is in response to a letter sent to you by Shannon Liss-Riordan yesterday. (Her letter references only the last of the cases listed above, but in truth it concerns all of them.)

Attorney Liss-Riordan's letter appears to seek an order from your Honor directing an expedited hearing on Plaintiffs' Emergency Motion for a Preliminary Injunction Striking Defendant's Arbitration Policy as Unconscionable and Enjoining Defendant's Demands for Arbitration, or in the Alternative, Striking Portions of the Arbitration Policy and Consolidating Coverall's Eight Pending Arbitrations.

For the reasons presented in my letter to the Court in the above-referenced matters dated October 31, 2005, these cases have been properly assigned to Judge Wolf, under the Local Rules. Coverall respectfully submits that Judge Wolf should be responsible for scheduling a hearing on Plaintiffs' Motion. (For its part, my client, Coverall North America, Inc., disputes Plaintiffs'



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contention that there is an “emergency” here: Plaintiffs could have avoided the claimed “emergency” had they moved sooner for the relief they now seek.)

Should your Honor believe that there remains a legitimate dispute over assignment of these matters, Coverall requests that your Honor resolve that dispute, then permit the Judge to whom these cases are ultimately assigned decide when to hear Plaintiffs’ Motion and Coverall’s opposition to that Motion.

Cordially,

A handwritten signature in black ink, appearing to read "Michael D. Vhay".

Michael D. Vhay

cc: The Honorable Mark L. Wolf (by e-filing)  
The Honorable Joseph L. Tauro (by e-filing)  
Shannon Liss-Riordan, Esq.  
Traci S. Feit, Esq.